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Attorneys for Plaintiffs Deisy Salas, Kristal Carmona, Israel Linthrop, Alicia-Krueger-Aguirre, and the Class

[Additional Counsel on Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

DEISY SALAS, KRISTAL CARMONA,
ISRAEL LINTHROP, ALICIA KRUEGER-
AGUIRRE, individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

v.

J & S RESTAURANTS, INC., a California
corporation; TOPP END ENTERPRISES,
INC., a California corporation; VALENCIA
TPP, a general partnership; YEASTIE
BOYS, a general partnership; and DOES 1
through 100, inclusive,

Defendants.

THEODORE CHRISTOPHER MILLER,
NOLAN MALONE, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiffs,

v.

VENTURA COUNTY RESTAURANT
SERVICES INC. DBA TOPPERS PIZZA
PLACE, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Lead Case No.: 56-2019-00526959-CU-
OE-VTA (*Salas* Action)
(*Consolidated with 56-2020-00546726-
CU-OE-VTA*)

Honorable Henry J. Walsh
Department 42

CLASS ACTION

**DECLARATION OF EDWIN
AIWAZIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEY'S FEES,
COSTS, AND ENHANCEMENT
PAYMENTS**

[Notice of Motion and Motion for Final Approval
of Class Action Settlement, Attorneys' Fees,
Costs, and Enhancement Payments; Declaration
of Class Counsel (Zack Broslavsky and Dennis
Hyun); Declarations of Class Representatives
(Deisy Salas, Kristal Carmona, Israel Linthrop,
Alicia Krueger-Aguirre, Theodore Christopher
Miller, and Nolan Malone); Declaration of
Settlement Administrator (Taylor Mitzner); and
[Proposed] Final Approval Order and Judgment
filed concurrently herewith]

Date: April 4, 2022
Time: 8:30 a.m.
Department: 42

Salas Complaint Filed: March 29, 2019
Salas FAC Filed: August 2, 2019
Salas SAC Filed: November 7, 2019
Salas TAC Filed: October 29, 2020
Miller Complaint Filed: August 5, 2019
Miller FAC Filed: September 29, 2020
Trial Date: None Set

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Attorneys for Plaintiffs Theodore Christopher Miller, Nolan Malone, and the Class

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwarzian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Deisy Salas, Kristal Carmona, Israel Linthorp, Alicia Krueger-Aguirre, Theodore Christopher Miller, and Nolan Malone (together, “Plaintiffs”) and the Class. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 1, 2021, in Department 42 of the above-entitled Court, the Honorable Henry J. Walsh preliminarily approved the Joint Stipulation of Class Action and PAGA Settlement (“Settlement,” “Agreement,” or “Settlement Agreement”) entered into between Plaintiffs and Defendants J & S Restaurants, Inc., Ventura County Restaurant Services, Inc. dba Toppers Pizza Place, Topp End Enterprises, Inc., Red Flash, Inc., Valencia TPP, and Yeastie Boys (“Defendants”), and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiffs Deisy Salas, Kristal Carmona, Israel Linthorp, Alicia Krueger-Aguirre, Theodore Christopher Miller, and Nolan Malone as Class Representatives. The Court also preliminarily appointed and designated Lawyers *for* Justice, PC, Broslavsky & Weinman, LLP, and Hyun Legal, APC as Class Counsel. The Court approved and ordered the mailing of the Notice of Class Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Phoenix Class Action Administration Solutions (“Phoenix”) to serve as Settlement Administrator for handling the notice and settlement administration process.

3. As of the date of filing the accompanying Motion for Final Approval, no Class Members have objected to the Settlement or the request for Attorneys' Fees and Costs, Enhancement Payments, Settlement Administration Costs, or allocation for the penalties under the Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”).

WORK PERFORMED BY CLASS COUNSEL

4. I have been actively engaged in litigating this matter since prior to the commencement of the actions on March 29, 2019, as have several other attorneys and members in our firm.

5. Before initiating the actions, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff Deisy Salas, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, representative PAGA claims, the claims of Plaintiffs, and potential defenses. After conducting initial investigation, our firm determined that the claims of Plaintiffs were well-suited for class-wide adjudication owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt employees employed by Defendants, who were not properly compensated for, *inter alia*, all hours worked, and non-compliant meal and rest periods.

6. We have worked closely with our co-counsels, Broslavsky & Weinman, LLP and Hyun Legal, APC, throughout the litigation of the matter. Together, with our co-counsel, we used the pre-mediation time period to investigate the veracity, strength, and scope of the claims, and also to prepare the matter for class certification, representative adjudication, and trial. The parties conducted significant formal and informal discovery and investigation into the facts of the case, and also informally exchanged information and data in preparation for mediation. Class Counsel propounded multiple sets of written discovery requests onto Defendants in various forms; reviewed Defendants' responses thereto; and prepared and served numerous deposition notices. Class Counsel also interviewed and obtained information from Plaintiffs and other Class Members, including and not limited to the names of potential witnesses, and reviewed and analyzed thousands of pages of documents and data produced by Defendants and obtained through other sources. The documents and data reviewed and analyzed by Class Counsel included, and were not limited to, employment records of Plaintiffs and Class Members,

1 a detailed sampling of Class Members' time and pay data, company policy acknowledgements,
2 internal memoranda, job descriptions, new hire packets, Defendants' operations and
3 employment practices, forms (including, but not limited to, Driver Performance Reports and the
4 Orientation Acknowledgment Form), procedures (including, but not limited to Defendants'
5 Meal and Rest Period Policy, Administrative Policies, Personnel Policies, Hourly Associate
6 Performance Appraisals, Reimbursement Reports, and Orientation Forms), among other
7 documents and data. Class Counsel researched applicable law, developed damages/valuation
8 models in preparation for mediation, and met and conferred with Defendants' counsel on
9 numerous occasions, e.g., to discuss issues relating to the pleadings, amended complaints, case
10 management, discovery, and production of various documents and data prior to mediation.
11 Other work performed by Class Counsel included, and was not limited to, case strategy and
12 analysis; drafting, reviewing, and revising pleadings and mediation brief; preparing and
13 appearing for court proceedings; and preparing for and attending mediation and settlement
14 negotiations. The work with our co-counsel has been a coordinated and combined effort. Areas
15 of responsibility were divided between the firms so as to avoid unnecessary duplication of work
16 and effort. When the abilities of experienced and skilled co-counsel were needed, the firms
17 worked together. For example, both firms worked together to strategize the matter and were
18 actively involved in reviewing documents that were produced in the matter, reviewing and
19 revising the terms of the Settlement, and in drafting and finalizing the motions for preliminary
20 approval and final approval of the Settlement.

21 7. As outlined herein, the parties have conducted significant formal and informal
22 discovery and investigation during the course of litigating the case. Class Counsel analyzed
23 thousands of pages of documents and data either produced by Plaintiffs and Defendants or
24 obtained by Class Counsel through other sources. These documents and data provided a critical
25 understanding of the nature of the work performed by the Class Members, as well as Defendants'
26 operations and employment policies, practices, and procedures, and were used in analyzing
27 liability, damages, and valuation issues in connection with all phases of the litigation, and
28 ultimately with the mediation and settlement negotiation process. Class Counsel also performed

significant research into the law concerning Defendants' defenses.

8. After conducting significant investigation of the facts and law during the prosecution of the case, counsel for the parties engaged in extensive settlement negotiations to try to resolve the entire matter. These efforts included participating in a formal, full-day mediation conducted by Paul Grossman, Esq., a well-regarded mediator experienced in mediating complex labor and employment matters. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position. Prior to and during mediation, the parties exchanged information and data, and discussed all aspects of the case, including the risks and delays of further litigation, the risks to the parties of proceeding with class certification and trial, the law relating to off-the-clock theory, meal and rest periods, representative PAGA claims, and wage-and-hour enforcement, the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendants also contended that individualized questions of fact predominate over any common issues, and these issues would pose challenges to certification and representative adjudication. Defendants and their counsel felt very strongly about Defendants' ability to prevail on the merits and to obtain a denial of class certification, while Plaintiffs and Class Counsel believed that class certification would be obtained and that they would prevail at trial. With the aid of the mediator's evaluation, the parties agreed that the cases were well-suited for settlement given the legal issues relating to Plaintiffs' principal claims, as well as the costs and risks to the parties that would attend further litigation. These risks of further litigation include, and are not limited to, a determination that the claims are unsuitable for class treatment and/or representative adjudication, failure to obtain certification, class de-certification after certification of a class, allowing a jury to decide the claims asserted in the case, and the real possibility of no recovery after years of litigation.

9. As set forth more fully in the accompanying Motion for Final Approval, Class Counsel seek attorneys' fees in the amount of \$805,000.00, which is thirty-five percent (35%) of the Total Settlement Amount of \$2,300,000.00, as set forth in the Settlement Agreement and the Class Notice. Pursuant to the contingency-fee agreement entered into by and between

1 Plaintiffs and Class Counsel, Plaintiffs have each agreed to contingency fees of at least thirty-
2 five percent (35%) of the recovery. The attorneys' fees sought are commensurate with: (1) the
3 risk that Class Counsel took in commencing the case; (2) the time, effort, and expense that Class
4 Counsel dedicated to the case; (3) the skill and determination that Class Counsel have shown;
5 (4) the results that Class Counsel have achieved throughout the litigation; (5) the value of the
6 settlement that Class Counsel have achieved for the Class Members; and (6) the other cases that
7 Class Counsel have turned down in order to devote their time and efforts to this matter.

8 10. I am aware that the common and acceptable rate for contingency representation in
9 wage and hour class action litigation is normally 40% before trial, with the range being from
10 33.3% up to 50%.

11 11. While not necessarily required to be demonstrated because the contingent fee is
12 proper for this settlement, Class Counsel have incurred many hours of work in connection with
13 prosecuting the cases such that the award of attorneys' fees is also justified under a simple
14 lodestar analysis. Lawyers for Justice, PC, Broslavsky & Weinman, LLP, and Hyun Legal,
15 APC have collectively spent a total of 1,211.5 hours, with 933.10 hours spent by Lawyers for
16 Justice, PC, performing tasks and obtaining recovery on behalf of Plaintiffs and the Class
17 Members. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time and Chart that sets
18 forth in detail the nature of the legal services provided by Lawyers for Justice, PC and the time
19 incurred in performing those services. These hours include work done by myself and several of
20 the firm's other members. We also had litigation support personnel actively engaged in assisting
21 with the prosecution of this matter.

22 12. The work performed in this particular matter, the background of our firm, as well
23 as the individual backgrounds, training, and experience of the attorneys who worked on this
24 matter, in litigating complex wage-and-hour matters, and in particular, employment class
25 actions, support a reasonable hourly rate of compensation at the rate of \$675 for work performed
26 by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees,
27 compensating the firm at the rate of at least \$675 per hour for legal services performed, by courts
28 granting final approval in other cases final approval of the class and representative action

1 settlement in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County
2 Superior Court Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020,
3 and the award of attorneys' fees involved an hourly rate of \$766.05; final approval of the class
4 and representative action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC*
5 (Alameda County Superior Court Case No. RG16835813) was granted on June 11, 2019, and
6 the award of attorneys' fees involved an hourly rate of \$764.82; *Seth Swan v. Pace Supply Corp.*
7 (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and
8 the award of attorneys' fees involved a higher hourly rate of \$855.96; final approval of the class
9 and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda
10 County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the
11 award of attorneys' fees involved a higher hourly rate of \$831.38; final approval of the class and
12 representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum*
13 (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the
14 award of attorney's fees involved a higher hourly rate of \$780.77; final approval of the class and
15 representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento
16 County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the
17 award of attorneys' fees involved a higher hourly rate of \$845.64.

18 13. **ADEQUACY OF LAWYERS for JUSTICE, PC**

19 **EDUCATION**

20 14. In May of 2004, I graduated from *Pepperdine University School of Law* with a
21 Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from
22 the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree
23 program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles
24 County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from
25 the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard*
26 *University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a
27 concentration in Natural Sciences from *Pepperdine University*.

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JUDICIAL EXTERNSHIPS

15. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION EXPERIENCE

16. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by *Girardi & Keese*.

17. At *Girardi & Keese*, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

18. Since its inception, in or around October of 2008, our firm has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, we have obtained millions of dollars on behalf of thousands of individuals in California.

EXAMPLES OF CLASS ACTION RESULTS

19. What follows are just a few examples of the type of results we have achieved on behalf of our clients:

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1 a) Our firm, in association with other co-counsel, represented the plaintiffs
2 in a wage-and-hour class and representative action against a major property management
3 company involving allegations of misclassification of various “manager” positions. On
4 September 20, 2010, the court granted final approval of the class and representative action
5 settlement. The Los Angeles County Superior Court Case Number is BC400414.

6 b) Our firm, in association with other co-counsel, represented the plaintiffs
7 in a wage-and-hour class action against a national retailer involving allegations of
8 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court
9 granted final approval of the class action settlement. The Los Angeles County Superior Court
10 Case Number is BC413498.

11 c) Our firm, in association with other co-counsel, represented the plaintiffs
12 in a wage-and-hour class and representative action against a national property management
13 company involving allegations of misclassification of the “Property Manager” position. On
14 May 23, 2012, the court granted final approval of the class and representative action settlement.
15 The Los Angeles County Superior Court Case Number is BC430918.

16 d) Our firm, in association with other co-counsel, represented the plaintiffs
17 in a wage-and-hour class action against a national retailer involving allegations of
18 misclassification of the “Store Manager” position. On June 10, 2011, the court granted
19 plaintiffs’ motion for class certification. On August 26, 2013, the court granted final approval
20 of the class action settlement. The Los Angeles County Superior Court Case Number is
21 BC424012.

22 e) Our firm, in association with other co-counsel, represented the plaintiffs
23 in a wage-and-hour class and representative action against a bank, involving allegations of
24 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
25 granted final approval of the class and representative action settlement. The Kern County
26 Superior Court Case Number is S-1500-CV-273194-LHB.

27 f) Our firm, in association with other co-counsel, represented the plaintiffs
28 in a wage-and-hour class and representative action against a national wholesale distributor of

1 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
2 “manager” positions. On May 22, 2014, the court granted final approval of the class and
3 representative action settlement. The Sacramento County Superior Court Case Number is 34-
4 2012-00136285.

5 g) Our firm, in association with other co-counsel, represented the plaintiffs
6 in a wage-and-hour class action involving allegations of misclassification of the “Operations
7 Manager” position. On September 16, 2014, the court granted plaintiffs’ motion for class
8 certification. The Los Angeles County Superior Court Case Number is BC478769.

9 h) Our firm, in association with other co-counsel, represented the plaintiffs
10 in a wage-and-hour class and representative action against a national retailer of household items,
11 on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted final
12 approval of the class and representative action settlement. The San Francisco County Superior
13 Court Case Number is CGC-13-532344.

14 i) Our firm, in association with other co-counsel, represented the plaintiffs
15 in a wage-and-hour class action involving allegations of misclassification of the salaried
16 residential “Property Manager” position. On September 17, 2015, the court granted plaintiffs’
17 motion for class certification. The Los Angeles County Superior Court Case Number is
18 BC474784.

19 j) Our firm, in association with other co-counsel, represented the plaintiffs
20 in a wage-and-hour class and representative action against a national retailer of upscale hardware
21 and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted
22 final approval of the class and representative action settlement. The Los Angeles County
23 Superior Court Case Number is JCCP4794.

24 k) Our firm, in association with other co-counsel, represented the plaintiffs
25 in a wage-and-hour class and representative action against a national retailer of apparel and
26 fashion accessories, on behalf of non-exempt employees. On August 5, 2016, the court granted
27 final approval of the class and representative action settlement. The Los Angeles County
28 Superior Court Case Number is BC488069.

1 l) Our firm, in association with other co-counsel, represented the plaintiffs
2 in a wage-and-hour class action against a national retailer of apparel, accessories, and home
3 products, involving allegations of misclassification of the “Department Manager” position. On
4 August 12, 2016, the court granted plaintiffs’ motion for class certification in part and certified
5 a class. The Alameda County Superior Court Case Number is RG13680477.

6 m) Our firm represented the plaintiff in a representative action under the
7 Private Attorneys General Act, against a real estate and property management company, on
8 behalf of non-exempt employees. On November 4, 2016, the Court granted approval of the
9 settlement. The Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-
10 CXC.

11 n) Our firm, in association with other co-counsel, represented the plaintiffs
12 in a wage-and-hour class action against a full-service bank, on behalf of non-exempt employees.
13 On November 18, 2016, the court granted final approval of the class action settlement. The San
14 Francisco County Superior Court Case Number is CJC-13-004839.

15 o) Our firm represented the plaintiffs in a wage-and-hour class and
16 representative action against a foodservice distributor, on behalf of non-exempt employees. On
17 January 26, 2017, the court granted final approval of the class and representative action
18 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

19 p) Our firm, on behalf of the plaintiff and respondent in a PAGA
20 representative action, successfully opposed in the trial court, and briefed and argued an appeal
21 with respect to the employer’s motion to compel arbitration, which resulted in a published
22 opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v.*
23 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. App. 4th Dist., Mar. 7, 2017), review
24 denied, cert. denied (U.S. Supreme Court Docket No. 17-254).

25 q) Our firm, in association with other co-counsel, represented the plaintiffs
26 in a wage-and-hour class and representative action against a consumer packaging company, on
27 behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the
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1 class and representative action settlement. The Los Angeles County Superior Court Case
2 Number is BC590429.

3 r) Our firm, in association with other co-counsel, represented the plaintiffs
4 in a wage-and-hour class action and representative action against a manufacturer of food service
5 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
6 approval of the class and representative action settlement. The Orange County Superior Court
7 Case Number is 30-2015-00810013-CU-OE-CXC.

8 s) Our firm represented the plaintiff in a wage-and-hour class and
9 representative action against a property management company, on behalf of non-exempt
10 employees. On June 14, 2017, the court granted final approval of the class and representative
11 action settlement. The Los Angeles County Superior Court Case Number is BC586234.

12 t) Our firm represented the plaintiffs in a wage-and-hour class action and
13 representative action against a food company on behalf of non-exempt employees. On June 30,
14 2017, the court granted final approval of the class and representative action settlement. The
15 Sacramento County Superior Court Case Number is 34-2015-00175871.

16 u) Our firm represented the plaintiffs in a wage-and-hour class action and
17 representative action against a chocolate company on behalf of non-exempt employees. On July
18 19, 2017, the court granted final approval of the class and representative action settlement. The
19 Alameda County Superior Court Case Number is RG15764300.

20 v) Our firm represented the plaintiffs in a wage-and-hour class action and
21 representative action against a manufacturer of plastic containers on behalf of non-exempt
22 employees. On October 31, 2017, the court granted final approval of the class and representative
23 action settlement. The Los Angeles County Superior Court Case Number is BC577233. Our
24 firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class
25 action and representative action against a property management company on behalf of hourly-
26 paid and non-exempt employees. On January 4, 2018, the court entered an order granting final
27 approval of the class and representative action settlement. The Los Angeles County Superior
28 Court Case Number is JCCP 4819.

1 w) Our firm, in association with other co-counsel, represented the plaintiffs
2 in a wage-and-hour class action and representative action against a global provider of flexible
3 office space solutions. On February 15, 2018, the court entered an order granting final approval
4 of the class and representative action settlement. The Los Angeles County Superior Court Case
5 Number is BC498401.

6 x) Our firm, in association with other co-counsel, represented the plaintiff in
7 a wage-and-hour class action against a container manufacturer, on behalf of non-exempt
8 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
9 The Tulare County Superior Court Case Number is VCU264528.

10 y) Our firm represented the plaintiffs in a wage-and-hour class and
11 representative action against a behavioral health service provider on behalf of non-exempt
12 employees. On November 13, 2018, the court granted final approval of the class and
13 representative action settlement. The Alameda County Superior Court Case Number is
14 RG16811450.

15 z) Our firm, in association with other co-counsel, represented the plaintiff in
16 a representative action under the Private Attorneys General Act, against a global provider of
17 products and services to the energy industry, on behalf of hourly-paid and non-exempt
18 employees. On November 19, 2018, the Court granted approval of the settlement. The Kern
19 County Superior Court Case Number is S-1500-CV-280215-SDC.

20 aa) Our firm represented the plaintiff in a wage-and-hour class action against
21 a parking company on behalf of non-exempt employees. On September 3, 2019, the court
22 granted the plaintiff's motion for class certification and certified a class. The Santa Clara
23 County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination
24 Proceeding Number is JCCP 4886.

25 bb) Our firm, in association with other counsel, on behalf of the plaintiff and
26 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
27 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
28 notable decision from the California Supreme Court clarifying the law and finding, in part, that

1 employer arbitration agreements are unenforceable where they block a PAGA claim from
2 proceeding, *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019).

3 cc) Our firm represented the plaintiffs in a wage-and-hour class and
4 representative action against a bank on behalf of non-exempt employees. On September 27,
5 2019, the court granted the plaintiffs' motion for class certification in part and certified a class.
6 The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council
7 Coordination Proceeding Number is JCCP 4921.

8 dd) Our firm represented the plaintiffs in a wage-and-hour class and
9 representative action against a national retailer of apparel and fashion accessories, on behalf of
10 non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class
11 certification in part and certified a class. The Sacramento County Superior Court Case Number
12 is 34-2015-00175330-CU-OE-GDS.

13 ee) Our firm represented the plaintiff in a wage-and-hour class and
14 representative action against a medical equipment supplier on behalf of non-exempt employees.
15 On February 13, 2020, the court granted the plaintiff's motion for class certification and certified
16 a class. The San Bernardino County Superior Court Case Number is CIVDS1505744.

17 ff) Our firm, in association with other counsel, represented the plaintiff in a
18 wage-and-hour class and PAGA representative action against a large national drug testing
19 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
20 plaintiff's motion for class certification and certified a class. The San Diego County Superior
21 Court Case Number is 37-2018-00019611-CU-OE-CTL.

22 gg) Our firm represented the plaintiffs in a wage-and-hour class and
23 representative action against a national retailer of sportswear, footwear, and camping equipment
24 on behalf of non-exempt employees. On March 16, 2020, the court granted in part the plaintiff's
25 motion for class certification and certified a class. The Riverside County Superior Court Case
26 Number is RICJCCP4930.

27 hh) Our firm represented the plaintiffs in a wage-and-hour class and PAGA
28 representative action against a plastic packaging company on behalf of non-exempt employees.

On June 8, 2020, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Bernardino County Superior Court Case Number is CIVDS1507361.

ii) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class action against manufacturer and supplier of power products and services on behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion for class certification and certified a class. The San Diego County Superior Court Case Number is 37-2015-00025968-CU-OE-CTL.

jj) Our firm represented the plaintiff in a wage-and-hour class action against nutritional products manufacturer on behalf of non-exempt production line employees. On December 13, 2021, the court granted the plaintiff's motion for class certification in part and certified a class. The Solano County Superior Court Case Number is FCS051001.

LITIGATION COSTS AND EXPENSES INCURRED BY CLASS COUNSEL

20. To date, Class Counsel have borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained by Plaintiffs and the Class Members. Lawyers for Justice, PC has incurred \$60,212.84 in litigation costs and expenses as reflected in "EXHIBIT B" attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement. It should be noted that Class Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained under the Settlement.

ENHANCEMENT PAYMENTS TO PLAINTIFFS

21. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for Enhancement Payments in the amount of \$10,000.00 each to Plaintiffs Deisy Salas, Kristal Carmona, Israel Linthorp, Alicia Krueger-Aguirre, Theodore Christopher Miller, and Nolan Malone to compensate Plaintiffs for the time and effort that they expended on behalf of the Class. The requested Enhancement Payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations. Plaintiffs were available whenever Class Counsel needed them and actively tried

1 to obtain information that would benefit the Class. Plaintiffs spent numerous hours speaking
2 with Class Counsel about their claims, describing their work experience with Defendants, and
3 gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs Deisy Salas,
4 Kristal Carmona, Israel Linthrop, Alicia Krueger-Aguirre, Theodore Christopher Miller, and
5 Nolan Malone to each receive \$10,000.00 as a reasonable Enhancement Payment, in addition to
6 their Individual Settlement Payments, for their services on behalf of the Class.

7 22. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
8 Settlement is in the best interests of Plaintiffs and other Class Members.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11 Executed this 10th day of March 2022, at Glendale, California.

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EXHIBIT A

SALAS, ET AL. V. J & S RESTAURANTS, INC., ET AL.
(VENTURA COUNTY SUPERIOR COURT CASE NO. 56-2019-00526959-CU-OE-VTA)
SALAS, ET AL. V. J & S RESTAURANTS, INC., ET AL.
(VENTURA COUNTY SUPERIOR COURT CASE NO. 56-2019-00529218-CU-OE-VTA) (“PAGA ACTION”)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS FOR JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on Class Certification Elements, including Adequacy, Typicality, Superiority, and Commonality	12.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Deisy Salas’ Claims and the Merits of the Claims of the Putative Class Members	10.60
Pre-Lawsuit Investigation of Potential Damages Exposure of Defendants J & S Restaurants, Inc., Topp End Enterprises, Inc., Red Flash, Inc., Valencia TPP, and Yeastie Boys (together, “Defendants”) with Respect to the Damages Sustained by Plaintiff Deisy Salas and the Putative Class	9.50
Pre-Lawsuit Investigation of the Merits of Plaintiff Deisy Salas’ PAGA Claim on Behalf of the State of California and Aggrieved Employees	9.80
Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendants with Respect to Plaintiff Deisy Salas, State of California, and Aggrieved Employees	8.20
Pre-Lawsuit Legal Research & Analysis of Latest Off-the-Clock, Meal and Rest Break, Representative PAGA, Arbitration Agreement, and Certification Decisions in California, Federal Preemption, Federal	12.40

Exemptions and Administrative Regulations, and the National Labor Relations Act, including all Relevant and New Federal and State Guidance and State DLSE and Federal DOL Materials	
Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate	5.90
Investigation of Defendants' Organizational and Corporate Structures, and Executive Reporting Structure as It Relates to the Employment and Management of the Putative Class Members	6.70
Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity	4.50
Analysis of Competitors within Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	5.70
Research and Investigation Re: Location(s), Divisions(s), Restaurants, and/or Store(s) Owned, Managed, or Operated by Defendants in California During the Class Period, Including Differences Between the Various Location(s), Division(s), Restaurant(s), and/or Store(s) to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	7.30
Comparative Analysis and Cross-Checking of All Available Job Postings and Job Reviews Regarding Defendants in Order to Determine Any Variation and Identify Job Duties and Responsibilities That Would be Susceptible to Being Performed Off-the-Clock or During Meal or Rest Breaks	5.80
Research and Investigation of Impact of COVID-19 Pandemic on Defendants, Their Operations, and Putative Class Members' Work	5.60
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Defendants' Locations at Which Putative Class Members Worked Throughout California	6.50

Research and Investigation Re: Defendants' Written and Unwritten Policies, Practices, and Procedures Relating to Reporting Time, Non-Discretionary Bonuses/Incentive/Shift Differential Pay, Regular Rate Calculations, Timekeeping, Donning and Doffing, Scheduling, Meal/Rest Breaks, Meal/Rest Premiums, Meal Waivers, On-Premises Breaks, Overtime Compensation, Deliveries, PPE, Uniform/Dress Code, Footwear, Personal Cell Phone Use, Personal Vehicle Use/Mileage, Reimbursement of Business-Related Expenses, and Wage and Hour Compliance	30.70
Research and Investigation Re: Software Programs, Applications, and Other Technology and Systems Defendants Use to Conduct Its Everyday Business, Including Timekeeping, Scheduling, and Point of Sale Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post Shift, and During Meal Breaks	6.50
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, Exemption, Pre-Emption, and Compliant Policies	10.20
Research and Investigation Re: Post- <i>Duran vs. U.S. Bank</i> Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	7.70
Research and Analysis of Defendants' Litigation Histories Involving Wage-and-Hour Issues and Other Related Employment Issues in Court and/or Other Forums	6.60
Prepare a Pre-Certification Discovery Strategy and Plan, including Topics of Inquiry Important to Certification and Representative Adjudication	17.50
Research, Brief, and Outline Class Certification Issues, Trial Plan, and Post-Certification Discovery Strategy and Plan, including Topics of Inquiry Important to Liability and Damages/Civil Penalties	15.40
Meet and Communicate with Plaintiff Deisy Salas throughout the Pendency of the Case	36.0
Meet and Communicate with Plaintiff Kristal Carmona throughout the Pendency of the Case	32.0

Meet and Communicate with Plaintiff Isreal Linthrop throughout the Pendency of the Case	31.0
Meet and Communicate with Plaintiff Alicia Krueger-Aguirre throughout the Pendency of the Case	33.0
Meet and Communicate with Putative Class Members	34.50
Pleadings and Court Filings	
Research and Draft Plaintiff Deisy Salas's Class Action Complaint for Damages and Legal Research and Analysis of All Claims Involved (filed on March 29, 2019)	9.20
Review Court's Notice of Case Assignment and Mandatory Appearance (filed on April 8, 2019)	0.10
Review Court's Minute Order Re Complex Determination (filed on April 15, 2019)	0.10
Review Court's Notice of Change of Track Assignment – Complex Case (filed on May 10, 2019)	0.10
Review and Analyze Defendant J & S Restaurants, Inc.'s Answer to Plaintiff's Unverified Class Action Complaint and Research Affirmative Defenses in Defendant's Answer (served on May 28, 2019)	3.10
Draft Plaintiff Deisy Salas's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (served on June 6, 2019) (PAGA Action)	7.10
Draft Plaintiff Deisy Salas's Notice of Posting Jury Fees and Notice of Posting Complex Fee (filed on June 11, 2019)	0.30
Research and Draft Plaintiff Deisy Salas's First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File [Proposed] Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (submitted on July 10, 2019)	6.60

Meet and Confer with Defendants' Counsel, and Draft Joint Stipulated Protective Order (submitted on July 10, 2019)	2.30
Review Court's Order Granting Plaintiff Leave to File Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on July 15, 2019)	0.10
Draft Request for Dismissal (filed on August 5, 2019) (PAGA Action)	0.50
Review and Analyze Defendant J & S Restaurants, Inc.'s Case Management Statement (served on August 12, 2019)	0.30
Draft Plaintiff Deisy Salas's Case Management Statement (filed on August 19, 2019)	0.70
Meet and Confer with Defendants' Counsel, and Draft Joint Complex Case Status Report (submitted to on August 23, 2019)	1.50
Review Court's Minute Order Re Case Management Conference (filed on August 28, 2019)	0.10
Review and Analyze Defendant J & S Restaurants, Inc.'s Answer to Plaintiff's Unverified First Amended Class Action Complaint for Damages and Enforcement Under PAGA and Research Affirmative Defenses in Defendant's Answer (served on September 3, 2019)	5.80
Research and Draft Plaintiffs Deisy Salas and Kristal Carmona's Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiff Leave to File [Proposed] Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (submitted on October 31, 2019)	5.20

Review Court's Order Granting Plaintiff Leave to File Second Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on November 7, 2019)	0.10
Review and Analyze Defendant J & S Restaurants, Inc.'s Answer to Plaintiffs' Unverified Second Amended Class Action Complaint for Damages and Enforcement Under PAGA and Research Affirmative Defenses in Defendant's Answer (served on December 27, 2019)	3.30
Meet and Confer with Defendants' Counsel, and Draft Updated Joint Complex Case Status Report (submitted on December 30, 2019)	1.50
Review Court's Minute Order Re Case Management Conference (filed on January 6, 2020)	0.10
Review Court's Minute Order Re Case Management Conference (filed on May 11, 2020)	0.10
Meet and Confer with Defendants' Counsel, and Draft Updated Joint Complex Case Status Report (submitted on June 10, 2020)	1.20
Meet and Confer with Defendants' Counsel, and Draft Updated Joint Complex Case Status Report (submitted on August 4, 2020)	0.90
Review Court's Minute Order (filed on August 18, 2020)	0.10
Review Defendant J & S Restaurants, Inc.'s Notice of Related Case (served on September 4, 2020)	0.30
Research and Draft Plaintiffs Deisy Salas, Kristal Carmona, Israel Linthrop, and Alicia Krueger-Aguirre's (together, "Plaintiffs") Third Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. and Legal Research and Analysis of All Claims Involved; Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation and [Proposed] Order Granting Plaintiffs Leave to File [Proposed] Third Amended Class Action	4.30

Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (submitted on October 8, 2020)	
Meet and Confer with Defendants' Counsel, and Draft Joint Stipulation to Continue Status Conference re: Complex Track; [Proposed] Order (submitted on October 12, 2020)	0.80
Review Court's Order Granting Joint Stipulation to Continue Status Conference re: Complex Track (filed on October 15, 2020)	0.10
Review Court's Order Granting Plaintiffs Leave to File Third Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code Section 2698, Et Seq. (filed on October 23, 2020)	0.10
Review and Analyze Defendants' Answer to Plaintiffs' Unverified Third Amended Class Action Complaint for Damages and Enforcement Under PAGA and Research Affirmative Defenses in Defendant's Answer (served on November 17, 2020)	2.50
Review Court's Minute Order (filed on February 1, 2021)	0.10
Meet and Confer with Other Plaintiffs' Counsel and Defendant's Counsel, and Draft Joint Notice of Settlement and Status Conference Statement (submitted on February 17, 2021)	0.90
Review Court's Minute Order Re Case Management Conference (filed on March 1, 2021)	0.10
Draft Plaintiffs' Notice Regarding March 1, 2021 Case Management Conference (filed on March 3, 2021)	0.30
Meet and Confer with Other Plaintiffs' Counsel and Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on May 28, 2021)	1.10
Review Court's Minute Order Re Case Management Conference (filed on June 7, 2021)	0.10

Meet and Confer with Other Plaintiffs' Counsel and Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on July 28, 2021)	0.90
Review Court's Minute Order Re Case Management Conference (filed on August 6, 2021)	0.10
Meet and Confer with Other Plaintiffs' Counsel and Defendant's Counsel, and Draft Joint Case Management Conference Statement (submitted on October 22, 2021)	0.80
Review Court's Minute Order Re Case Management Conference (filed on November 1, 2021)	0.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (August 28, 2019)	1.10
Prepare for and Telephonically Attend Case Management Conference (January 6, 2020)	1.10
Prepare for, Travel to/from, and Attend Hearing on Plaintiff's Motion to Compel Defendant to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions (January 10, 2020)	6.50
Prepare for and Telephonically Attend Hearing on Joinder of Defendants' Motion to Consolidate Actions (February 1, 2021)	1.60
Prepare for and Telephonically Attend Case Management Conference (March 1, 2021)	0.90
Prepare for and Telephonically Attend Case Management Conference (June 7, 2021)	0.80
Prepare for and Telephonically Attend Case Management Conference (August 6, 2021)	0.90
Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (November 1, 2021)	2.50

Prepare for and Telephonically Attend Hearing on Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payments (April 4, 2022) (Anticipated)	2.50
Discovery and Deposition	
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Deisy Salas (served on January 29, 2019)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Deisy Salas (served on February 18, 2019)	4.60
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kristal Carmona (served on April 23, 2019)	1.90
Draft Plaintiff Deisy Salas's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) to Defendant J & S Restaurants, Inc. (served on June 4, 2019)	10.50
Draft Plaintiff Deisy Salas's Notice of Deposition of Person Most Knowledgeable at Defendant J & S Restaurants, Inc. and Requests for Production of Documents (noticed for July 17, 2019; Organizational Structure) (served on June 4, 2019)	5.80
Draft Plaintiff Deisy Salas's Notice of Deposition of Person Most Knowledgeable at Defendant J & S Restaurants, Inc. and Requests for Production of Documents (noticed for July 18, 2019; Job Duties) (served on June 4, 2019)	5.20
Draft Plaintiff Deisy Salas's Notice of Deposition of Person Most Knowledgeable at Defendant J & S Restaurants, Inc. and Requests for Production of Documents (noticed for July 19, 2019; Affirmative Defenses) (served on June 4, 2019)	6.70

Review and Analyze Defendant J & S Restaurants, Inc.'s Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed July 17, 2019; Organizational Structure) (served on July 11, 2019)	2.90
Review and Analyze Defendant J & S Restaurants, Inc.'s Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 18, 2019; Job Duties) (served on July 11, 2019)	3.60
Review and Analyze Defendant J & S Restaurants, Inc.'s Objection to Plaintiff's Notice of Deposition of Person Most Knowledgeable at Defendant and Requests for Production of Documents (noticed for July 19, 2019; Affirmative Defenses) (served on July 11, 2019)	5.80
Draft Follow-Up Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kristal Carmona (served on July 17, 2019)	0.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kristal Carmona (served on July 24, 2019)	3.90
Review and Analyze Documents Produced by Defendant J & S Restaurants, Inc. (served on August 2, 2019)	3.10
Review and Analyze Defendant J & S Restaurants, Inc.'s Responses to Plaintiff's Form Interrogatories - General (Set One), Special Interrogatories (Set One), Special Interrogatories (Set Two), Special Interrogatories (Set Three), Requests for Production of Documents (Set One), and Requests for Production of Documents (Set Two) (served on August 21, 2019)	13.70
Review and Analyze Documents Produced by Defendant J & S Restaurants, Inc. (served on August 21, 2019)	15.10
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alicia Krueger-Aguirre (served on October 11, 2019)	1.90

Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on October 15, 2019)	1.80
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Alicia Krueger-Aguirre (served on November 1, 2019)	4.50
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Putative Class Member (served on November 1, 2019)	1.20
Review and Analyze Defendant J & S Restaurants, Inc.'s Supplemental Response to Plaintiff's Requests for Production of Documents (Set One) (served on November 25, 2019)	2.90
Draft Letter to Defendants Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Israel Linthrop (served on December 2, 2019)	1.90
Review and Analyze Documents Produced by Defendants in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Israel Linthrop (served on December 19, 2019)	2.60
Review and Analyze Defendant J & S Restaurants, Inc.'s Supplemental Responses to Plaintiff's Special Interrogatories (Set Two) (served on January 29, 2020)	2.50
Review and Analyze Documents Produced by Defendant J & S Restaurants, Inc. [J&S00001-03518] (served on January 31, 2020)	29.30
Review and Analyze Documents Produced by Defendant J & S Restaurants, Inc. [J&S03519-08844] (served on February 6, 2020)	44.10
Draft Plaintiffs Alicia Kruger-Aguirre and Israel Linthrops' Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Defendant Red Flash, Inc. (served on December 9, 2020)	6.70

Draft Plaintiffs Alicia Kruger-Aguirre and Israel Linthrops' Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Defendant Topp End Enterprises, Inc. (served on December 9, 2020)	4.50
Draft Plaintiffs Alicia Kruger-Aguirre and Israel Linthrops' Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Defendant Valencia TPP (served on December 9, 2020)	4.20
Draft Plaintiffs Alicia Kruger-Aguirre and Israel Linthrops' Form Interrogatories - General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Defendant Yeastie Boys (served on December 9, 2020)	4.70
Draft Plaintiffs Alicia Kruger-Aguirre and Israel Linthrops' Special Interrogatories (Set Four), and Requests for Production of Documents (Set Three) to Defendant J & S Restaurants, Inc. (served on December 9, 2020)	3.70
Review and Analyze Documents Produced by Defendant J & S Restaurants, Inc. [J&S09250-09336] (served on February 1, 2021)	3.10
Draft <i>Belaire-West</i> Notice and Opt-Out Postcard and Meet and Confer with Defendants' Counsel and Third-Party Administrator Regarding <i>Belaire-West</i> Administration (notice mailed on August 30, 2019)	4.50
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Deisy Salas for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on March 13, 2019)	4.10
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Kristal Carmona for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 10, 2019)	3.90

Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Alicia Krueger-Aguirre for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on June 18, 2020)	3.50
Draft Notice to California Labor and Workforce Development Agency Re: Claims of Plaintiff Isreal Linthrop for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on June 18, 2020)	3.20
Meet with Defendants' Counsel and Other Plaintiffs' Counsel, and Draft Correspondence to, and Respond to Correspondence from, Defendant's Counsel and Other Plaintiffs' Counsel	45.50
Mediation/Settlement	
Review and Analyze Mediation Data and Documents Produced by Defendants (served on February 6, 2020, January 6, 2021, January 12, 2021, January 18, 2021, and January 19, 2021) • Employee Handbooks and Policies • Sampling of Employee Time Data • Sampling of Employee Pay Data	58.30
Prepare for Mediation, Including Researching Settlement-Related Issues and Merits of Claims, Drafting the Mediation Brief, Compiling the Mediation Exhibits in Support of Mediation Brief, Performing Damages and Penalties Analysis and Calculations, and Meeting and Confering with Expert(s) and/or Consultant(s) (submitted on February 4, 2021)	39.40
Telephonically Attend Mediation Session (February 10, 2021; Zoom Video Conference)	9.50
Research and Investigate Defendants' PPP Loan Status	3.10
Draft, Review, Revise, Negotiate, and Finalize Class Action and PAGA Settlement Agreement (executed on July 28, 2021) and Draft Exhibits	14.50

Coordinate Settlement Administration with Settlement Administrator, Ongoing Monitoring of Settlement Administration, and Responding to Class Inquiries	3.80
Law and Motion	
Research and Draft Plaintiff Deisy Salas's Notice of Demurrer and Demurrer to Defendant J & S Restaurants, Inc.'s Answer, Declaration of Arya Mansour in Support Thereof, and [Proposed] Order Thereon (filed on June 17, 2019)	5.20
Research and Draft Plaintiff Deisy Salas's Notice of Motion to Strike and Motion to Strike Defendant's Answer, Declaration of Arya Mansour in Support Thereof, and [Proposed] Order Thereon (filed on June 17, 2019)	4.90
Research and Draft Plaintiff Deisy Salas's Notice of Motion and Motion to Compel Defendant J&S Restaurants, Inc. to Provide Further Responses to Plaintiff's Special Interrogatories (Set Two) and Request for Monetary Sanctions, Rule 3.1345 Separate Statement in Support Thereof, Declaration of Daniel J. Kramer in Support Thereof, and [Proposed] Order Thereon (filed November 25, 2019)	3.20
Review and Analyze Defendant J & S Restaurants, Inc.'s Opposition to Plaintiff's Motion to Compel Further Responses to Special Interrogatories (Set Two) and Request for Monetary Sanctions, Declaration of Brier Miron Setlur, and Separate Statement (served on December 27, 2019)	1.10
Research and Draft Plaintiffs Deisy Salas and Kristal Carmon's Reply in Support of Plaintiff's Motion to Compel Further Responses to Special Interrogatories (Set Two) and Request for Monetary Sanctions (filed on January 3, 2020)	1.60
Review Court's Minute Order Re Motion to Compel (filed on January 10, 2020)	0.10
Review Defendant J & S Restaurants, Inc.'s Notice of Ruling on Plaintiff's Motion to Compel Further Responses to Special Interrogatories (Set Two) and Request for Monetary Sanctions (served on January 17, 2020)	0.10

Review and Analyze Defendants' Notice of Motion and Motion to Consolidate Actions; Memorandum of Points and Authorities, Declaration of Brian Miron Setlur, and [Proposed] Order Granting Defendant's Motion to Consolidate Actions (served on January 4, 2021)	2.50
Review Plaintiffs Theodore Christopher Miller and Nolan Malone's Notice of Joinder and Joinder of Defendants' Motion to Consolidate Actions, and Declaration of Dennis S. Hyun in Support Thereof (served on January 7, 2021)	0.60
Draft Plaintiffs' Opposition to Defendants' Motion to Consolidate Actions, Opposition to Plaintiffs Theodore Christopher Miller and Nolan Malone's Joinder of Defendants' Motion to Consolidate, Declaration of Daniel J. Kramer in Support Thereof, and Request for Judicial Notice in Support Thereof (filed on January 19, 2021)	8.80
Review and Analyze Defendants' Reply to Plaintiffs' Opposition to Defendants' Motion to Consolidate Actions (served on January 25, 2021)	1.20
Review Defendants' Notice of Ruling of Defendants' Motion to Consolidate Actions (served on February 2, 2021)	0.20
Research and Draft Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Edwin Aiwarzian in Support Thereof, Declaration of Deisy Salas in Support Thereof, Declaration of Kristal Carmona in Support Thereof, Declaration of Israel Linthrop in Support Thereof, Declaration of Alicia Krueger-Aguirre in Support Thereof, and [Proposed] Order Thereon (filed on September 30, 2021)	24.90
Draft Plaintiffs' Notice of Continuance of Hearing of Motion for Preliminary Approval of Class Action Settlement (filed on October 25, 2021)	0.20
Draft Plaintiffs' Notice Regarding November 1, 2021 Motion for Preliminary Approval of Class Action Settlement Hearing (filed on November 1, 2021)	0.30

Review Court's Order Granting Preliminary Approval of Class Action Settlement (filed on November 3, 2021)	0.20
Review and Analyze Settlement Administrator's Declaration Regarding Settlement Notice Administration; and Research and Draft Plaintiffs' Motion for Final Approval of Class Action Settlement, Attorneys' Fees, Costs, and Enhancement Payments, Declaration of Edwin Aiwazian in Support Thereof, Declaration of Deisy Salas in Support Thereof, Declaration of Kristal Carmona in Support Thereof, Declaration of Israel Linthrop in Support Thereof, Declaration of Alicia Krueger-Aguirre in Support Thereof, and [Proposed] Final Approval Order and Judgment (filed on March 10, 2021) (Anticipated)	26.50
Total Hours:	933.10

EXHIBIT B

LAWYERS for JUSTICE PC CASE COST DETAIL
Salas v. J and S Restaurants, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
1/29/2019	U.S. Postmaster	Postage	6.85
3/13/2019	Labor & Workforce Development Agency	Filing Fee	75.00
3/13/2019	U.S. Postmaster	Postage	6.85
3/29/2019	Prolegal	Attorney Service	158.45
3/29/2019	Ventura Superior Court	Filing Fee	435.00
4/23/2019	U.S. Postmaster	Postage	6.85
4/25/2019	Prolegal	Attorney Service	217.95
5/29/2019	One Legal	Attorney Service	100.00
5/31/2019	One Legal	Attorney Service	100.00
6/4/2019	Golden State Overnight	Courier Service	19.10
6/11/2019	Ventura Superior Court	Complex Fee	1,000.00
6/11/2019	Golden State Overnight	Courier Service	17.62
6/11/2019	Legal Document Server, Inc.	Attorney Service	300.25
6/11/2019	Ventura Superior Court	Jury Fee	150.00
6/17/2019	Golden State Overnight	Courier Service	17.62
6/17/2019	Legal Document Server, Inc.	Attorney Service	174.20
6/17/2019	One Legal	Attorney Service	100.00
6/17/2019	Ventura Superior Court	Filing Fee	120.00
6/18/2019	Legal Document Server, Inc.	Attorney Service	150.00
7/10/2019	Golden State Overnight	Courier Service	17.41
7/10/2019	Legal Document Server, Inc.	Attorney Service	130.70
7/10/2019	Ventura Superior Court	Filing Fee	20.00
7/17/2019	U.S. Postmaster	Postage	7.00
8/2/2019	Golden State Overnight	Courier Service	17.41
8/20/2019	Golden State Overnight	Courier Service	13.68
8/23/2019	CourtCall, LLC	Attorney Service	94.00
8/23/2019	Golden State Overnight	Courier Service	13.68
9/5/2019	Golden State Overnight	Courier Service	18.16
9/10/2019	Labor & Workforce Development Agency	Filing Fee	75.00
9/10/2019	U.S. Postmaster	Postage	6.85
10/11/2019	U.S. Postmaster	Postage	6.85
10/15/2019	U.S. Postmaster	Postage	6.85
10/17/2019	Simpluris, Inc.	Privacy Mailing	1,000.00
10/30/2019	Golden State Overnight	Courier Service	17.55
10/31/2019	Legal Document Server, Inc.	Attorney Service	130.70
10/31/2019	Ventura Superior Court	Filing Fee	20.00
11/25/2019	Golden State Overnight	Courier Service	22.91
11/25/2019	Legal Document Server, Inc.	Attorney Service	172.10
11/25/2019	Ventura County Superior Court	Filing Fee	60.00
12/2/2019	U.S. Postmaster	Postage	6.85

LAWYERS for JUSTICE PC CASE COST DETAIL

Salas v. J and S Restaurants, Inc.

12/30/2019	Legal Document Server, Inc.	Attorney Service	130.00
12/30/2019	Golden State Overnight	Courier Service	24.56
1/2/2020	CourtCall, LLC	Attorney Service	94.00
1/2/2020	FedEx Express	Courier Service	21.57
1/3/2020	General Logistics Systems US, Inc.	Courier Service	14.20
1/3/2020	General Logistics Systems US, Inc.	Courier Service	13.30
1/3/2020	Legal Document Server, Inc.	Attorney Service	130.00
1/7/2020	FedEx Express	Courier Service	22.49
1/10/2020	Daniel Kramer	Travel Reimbursement	67.97
6/10/2020	Legal Document Server, Inc.	Attorney Service	130.00
6/18/2020	Labor & Workforce Development Agency	Filing Fee	150.00
8/4/2020	Legal Document Server, Inc.	Attorney Service	130.00
8/4/2020	General Logistics Systems US, Inc.	Courier Service	13.98
8/13/2020	Daniel Kramer	Travel Reimbursement	8.20
8/14/2020	CourtCall, LLC	Attorney Service	94.00
10/8/2020	Legal Document Server, Inc.	Attorney Service	150.70
10/8/2020	Ventura County Superior Court	Filing Fee	20.00
10/8/2020	General Logistics Systems US, Inc.	Courier Service	20.08
10/29/2020	Legal Document Server, Inc.	Attorney Service	150.00
10/29/2020	General Logistics Systems US, Inc.	Courier Service	14.48
12/9/2020	General Logistics Systems US, Inc.	Courier Service	20.97
12/31/2020	Paul Hastings LLP	Mediation Fee	12,000.00
1/19/2021	General Logistics Systems US, Inc.	Courier Service	16.88
1/21/2021	Legal Document Server, Inc.	Attorney Service	171.50
1/23/2021	Stats Company	Analysis of Sampling of Time Records	7,728.00
1/26/2021	Legal Document Server, Inc.	Attorney Service	130.00
1/29/2021	CourtCall, LLC	Attorney Service	94.00
1/30/2021	Stats Company	Analysis of Sampling of Time Records	6,583.50
2/6/2021	Stats Company	Analysis of Sampling of Time Records	7,119.00
2/9/2021	Numerical Company	Analysis of Sampling of Time Records	7,760.00
2/10/2021	Robert A. Parris	Damages Consulting Expert	9,000.00
2/17/2021	Legal Document Server, Inc.	Attorney Service	165.00
2/17/2021	Ventura County Superior Court	Complex Fee	1,000.00
3/3/2021	Legal Document Server, Inc.	Attorney Service	120.00
3/8/2021	CourtCall, LLC	Attorney Service	94.00
6/4/2021	CourtCall, LLC	Attorney Service	94.00
6/15/2021	Legal Document Server, Inc.	Attorney Service	130.00
8/4/2021	CourtCall, LLC	Attorney Service	94.00
9/30/2021	Legal Document Server, Inc.	Attorney Service	196.80
9/30/2021	Ventura Superior Court	Filing Fee	60.00
10/22/2021	Legal Document Server, Inc.	Attorney Service	130.00
10/22/2021	CourtCall, LLC	Attorney Service	94.00

LAWYERS for JUSTICE PC CASE COST DETAIL
Salas v. J and S Restaurants, Inc.

10/22/2021	CourtCall, LLC	Attorney Service	94.00
10/25/2021	Legal Document Server, Inc.	Attorney Service	120.00
10/29/2021	CourtCall, LLC	Attorney Service	94.00
Total:			59,522.62

LAWYERS for JUSTICE PC CASE COST DETAIL
Salas v. J and S Restaurant, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
6/6/2019	Legal Document Server, Inc.	Attorney Service	135.22
6/6/2019	Ventura County Superior Court	Filing Fee	435.00
7/23/2019	Legal Document Server, Inc.	Attorney Service	120.00
Total:			690.22